

1 PAUL J. PASCUZZI, State Bar No. 148810
JASON E. RIOS, State Bar No. 190086
2 THOMAS R. PHINNEY, State Bar No. 159435
FELDERSTEIN FITZGERALD
3 WILLOUGHBY PASCUZZI & RIOS LLP
500 Capitol Mall, Suite 2250
4 Sacramento, CA 95814
Telephone: (916) 329-7400
5 Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
6 jrios@ffwplaw.com
tphinney@ffwplaw.com

7 ORI KATZ, State Bar No. 209561
8 ALAN H. MARTIN, State Bar No. 132301
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
9 A Limited Liability Partnership
Including Professional Corporations
10 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
11 Telephone: (415) 434-9100
Facsimile: (415) 434-3947
12 Email: okatz@sheppardmullin.com
amartin@sheppardmullin.com

13 Attorneys for The Roman Catholic Archbishop of
14 San Francisco

15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re

Case No. 23-30564

18 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Chapter 11

19 Debtor and
20 Debtor in Possession.

**DECLARATION OF ROCIO RODRIGUEZ
REGARDING SUPPLEMENTAL
COMPLIANCE WITH NOTICING
PROVISIONS OF BAR DATE ORDER**

No Hearing Requested

23 I, Rocio Rodriguez, declare as follows:

24 1. I am the Archdiocesan Victim Assistance Coordinator for The Roman Catholic
25 Archbishop of San Francisco, the debtor and debtor in possession herein (the “RCASF” or the
26 “Debtor”). I am a licensed marriage and family therapist and responsible for (a) overseeing the
27
28

1 administration of counseling, treatment, and programming for Survivor Claimants¹ (the “Abuse
2 Survivors’ Assistance”), and (b) ensuring that the aims of the Abuse Survivors’ Assistance programs
3 are met and that the programs needs are satisfied. I have personal knowledge of the facts contained
4 in this declaration, except as to matters alleged upon information and belief, and as to those matters,
5 I believe them to be true. If called upon as a witness, I could and would testify as follows.

6 2. I make this declaration concerning the Debtor’s efforts to inform certain potential
7 Survivor Claimants of the February 20, 2024 deadline to assert and file claims against the Debtor
8 (the “Bar Date”).

9 3. I have been informed by the Debtor’s bankruptcy counsel and understand that the
10 Court entered the *Order: (1) Fixing Time for Filing Proofs of Claim; (2) Approving Proof of Claim*
11 *Forms; (3) Providing Confidential Protocols; and (4) Approving Form and Manner of Notice* [ECF
12 No. 337] (the “Bar Date Order”) on November 21, 2023.

13 4. In the weeks leading up to the entry of the Bar Date Order, I worked with the Debtor’s
14 bankruptcy counsel to prepare a list of parishioners who have indicated that they may be potential
15 Survivor Claimants. Specifically, I reviewed the Debtor’s files (as maintained in connection with
16 the Debtor’s administration of the Abuse Survivors’ Assistance programs) and advised the Debtor’s
17 bankruptcy counsel regarding (a) mailing information for potential Survivor Claimants who may
18 not be represented by independent counsel; and (b) the identification of additional potential Survivor
19 Claimants to be given notice of the Bar Date on December 6, 2023. All Survivor Claimants for
20 whom the Debtor has a mailing address were mailed notice of the Bar Date on December 6, 2023.

21 5. After the Debtor caused notice of the Bar Date to be given to all potential Survivor
22 Claimants on December 6, 2023, I continued to work with the Debtor’s bankruptcy counsel to ensure
23 that as many potential Survivor Claimants were afforded the opportunity to assert timely claims
24 against the Debtor.


25 6. I worked with the Debtor’s bankruptcy counsel to identify current and past
26

27 ¹ Capitalized terms not otherwise defined in this declaration shall have the same meanings
28 ascribed to them in the Bar Date Order (defined below).

1 participants of the Abuse Survivors' Assistance programs for whom the Debtor only has telephone
2 or e-mail contact information.

3 7. Ultimately, the Debtor identified 15 current or past participants of the Abuse
4 Survivors' Assistance programs for whom the Debtor only has telephone and/or e-mail contact
5 information. In early February, I called all of the available phone numbers to provide notice of the
6 Bar Date. I also sent detailed emails to all available email addresses to provide notice of the Bar
7 Date.

8 I declare under penalty of perjury under the laws of the United States that the foregoing facts
9 are true and correct, and that this declaration was executed on March 14, 2024, in San Francisco,
10 California.

DocuSigned by:


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Rocio Rodriguez